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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LATAM Airlines Group, S.A., *et al.*,

Debtors.

Chapter 11
Case No. 20-11254 (JLG)

(Jointly Administered)

**STATEMENT OF QATAR AIRWAYS INVESTMENTS (UK) LTD.
CONCERNING DEBTORS' FIFTH MOTION FOR ENTRY OF AN ORDER
EXTENDING THE DEBTORS' EXCLUSIVE PERIODS IN WHICH
TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF
AND IN RESPONSE TO CERTAIN FILINGS MADE IN RESPONSE THERETO**

Qatar Airways Investments (UK) Ltd. ("**Qatar**") respectfully submits this statement ("**Statement**") concerning the *Debtors' Fifth Motion for Entry of an Order Extending the Debtors' Exclusive Periods in Which to File a Chapter 11 Plan and Solicit Acceptances Thereof* [ECF No. 3363] (the "**Motion**")¹ and in response to (i) Parent Ad Hoc Claimant Group's Limited Objection [ECF No. 3394] (the "**Ad Hoc Limited Objection**"), and (ii) the *Statement of the Official Committee of Unsecured Creditors Regarding Debtors' Fifth Motion for Entry of*

¹ All capitalized terms not otherwise defined herein shall have the meaning given to them in the Motion.

an Order Extending the Debtors' Exclusive Periods in Which to File a Chapter 11 Plan and Solicit Acceptances Thereof [ECF No. 3392] (the “UCC Statement”).

STATEMENT

1. Qatar shares the Debtors' belief that it is in the best interest of all parties to extend exclusivity for filing a chapter 11 plan through expiration of the statutory period.

2. In addition, while Qatar disagrees with many of the statements and characterizations contained in the Ad Hoc Limited Objection, Qatar supports the view that mediation is appropriate and necessary at this juncture to assist the parties in connection with plan negotiations and exit constructs. There can be no serious doubt that mediation of the complex plan-related issues currently confronting the parties is the best avenue to attempt global resolution of the issues that were highlighted by the Court during the July 30, 2021 hearing and which resulted in the Court entering the *Order Appointing Hon. Allan L. Gropper (Ret.) As Mediator* on August 31, 2021 [ECF No. 3060].

3. To that end, Qatar further submits that the UCC's position that mediation only include “the Committee and its principal creditor groups” makes no sense given that the Debtors' major shareholders are necessary parties if the goal is, as it should be, global resolution to enable the Debtors to emerge from these cases quickly and efficiently. UCC Statement ¶ 9. Absent participation of the Debtors' major shareholders, mediation will be wholly ineffective.²

² Qatar also strongly disagrees with the various statements made in the UCC Statement regarding alleged violations of the absolute priority rule, undue pressure being exerted by the Debtors in favor of the Debtors' major shareholders and an overall unfair plan process. See ¶¶ 2, 4 and 7. Suffice it to say, the UCC's statements are factually and legally incorrect and will be addressed more fully at the appropriate time.

4. Last, if the Court is inclined to terminate exclusivity (which Qatar does not support at this time), the Court should not limit that relief to any one particular party, but instead open the process to others, including the Debtors' major shareholders.

5. Based upon the foregoing, Qatar files this Statement and hereby reserves all of its rights, including the right to be heard at the hearing on the Motion and to respond to any arguments made by any party in connection therewith.

Dated: October 25, 2021
New York, New York

ALSTON & BIRD LLP

By: /s/ Gerard S. Catalanello
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CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused to be served true and correct copies of the foregoing *STATEMENT OF QATAR AIRWAYS INVESTMENTS (UK) LTD. CONCERNING DEBTORS' FIFTH MOTION FOR ENTRY OF AN ORDER EXTENDING THE DEBTORS' EXCLUSIVE PERIODS IN WHICH TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF AND IN RESPONSE TO CERTAIN FILINGS MADE IN RESPONSE THERETO* by filing such with the Court's CM/ECF system.

/s/ Gerard S. Catalanello
Gerard S. Catalanello